

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

BEEQB, LLC, a Florida Corporation,                         )  
  )  
  )  
Plaintiff,    )  
  )  
  )  
vs.    )  
  )  
BLOCKQUARRY CORP., f/k/a ISW                              )  
HOLDINGS, INC., a Nevada Corporation,                      )  
And PANTEHON RESOURCES, INC.,                              )  
  )  
  )  
Defendant.    )  
  )

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**MOTION TO DISMISS AMENDED  
COUNTERCLAIMS OF DEFENDANT  
BLOCKQUARRY, CORP.**

Pursuant to Fed. R. Civ. P. 12(b)(6), Plaintiff Beeqb, LLC moves to dismiss the amended counterclaims of Defendant Blockquarry Corp, f/k/a ISW Holdings, Inc. Plaintiff submits the attached memorandum of law in support of its motion.

Respectfully submitted,

/s/ Graham L. Newman  
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*Pending Pro Hac Vice Admission*

ATTORNEYS FOR PLAINTIFF